

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

OAKLEY, INC.,

Plaintiff,

v.

CKFON OUTDOOR CO.,LT D STORE, et al.,

Defendants.

Case No. 21-cv-03836

**Judge Sharon Johnson Coleman**

**Magistrate Judge Maria Valdez**

**DECLARATION OF JUSTIN R. GAUDIO**

I, Justin R. Gaudio, of the City of Chicago, in the State of Illinois, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff Oakley, Inc. ("Oakley" or "Plaintiff"). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:
2. I hereby certify that the Defaulting Defendants (as defined in the accompanying Memorandum) have failed to answer or otherwise plead in this action within the allotted time in violation of Federal Rule of Civil Procedure 12(a)(1)(A).
3. My office investigated the infringing activities of the Defaulting Defendants, including attempting to identify the registrant of each associated e-commerce stores operating under the Seller Aliases and its contact information. Our investigation confirmed that the Defaulting Defendants are primarily domiciled in China. As such, I am informed and believe that the Defaulting Defendants are not active-duty members of the U.S. armed forces.

4. The limited information provided by PayPal, Inc. ("PayPal"), Alipay, DHgate, and Amazon.com ("Amazon") for Defaulting Defendants indicates that the amount currently restrained in Defaulting Defendants' known financial accounts ranges from \$0 - \$29,279.
5. A breakdown by Defaulting Defendant of the amount currently restrained and Plaintiff's requested profit award is in the table below.

<b>Defaulting Defendant Seller Aliases</b>	<b>Amount Restrained</b>	<b>Requested Profit Award</b>
3 period Store	\$16	\$250
Aliqite Cycling Store	\$57	\$250
camping cycling Store	\$0	\$250
CKFON OUTDOOR CO.,LT D Store	\$1	\$250
CoolMart Outdoor Store	\$1,767	\$1,767
KKY-Online Store	\$19	\$250
liang jialiang's store	\$18	\$250
MARTIN-FOX Store	\$292	\$292
My Fitness Equipment Store	\$112	\$250
NEENCA Store	\$14,229	\$14,229
Ninth World Fitness shop Store	\$62	\$250
on the way outdoor Store	\$465	\$465
Outdoor equipment experience Store	\$49	\$250
Outdoor personof the shop Store	\$51	\$250
Rankin Store	\$8	\$250
SNiMO Store	\$93	\$250
Traveler's spring Store	\$0	\$250
up the heartbeat Store	\$0	\$250
Uuyee Store	\$17	\$250
VV fishing Store	\$1,154	\$1,154
We Fun Store	\$483	\$483
Zichen Cycling Store	\$1	\$250
YLY riding Store	\$0	\$250
Aislent	\$2,150	\$2,150
boyandgirlfriend	\$29,279	\$29,279
Cake Bubble	\$801	\$801
DAMAIWANGLUOKEJI	\$272	\$272
FuYiHeng	\$153	\$250
GUOQIANH	\$0	\$250
HOUAIHUA	\$126	\$250
HUIHUIGO	\$0	\$250

ruoyijiqiren	\$154	\$250
SXQWSY	\$3,706	\$3,706
childrendm	\$45	\$250
ftiier	\$657	\$657
goodoutdoors	\$23	\$250
Live 4 Sports Store	\$1,224	\$1,224
qianshu33	\$155	\$250
sportoutdoor123	\$0	\$250
ouyangouyang	\$1,189	\$1,189
radton.liga	\$0	\$250

6. **Exhibit 1** is an accurate copy of unpublished decisions cited in the corresponding Memorandum in Support of Plaintiff's Motion for Entry of Default and Default Judgment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 16<sup>th</sup> day of September 2021 at Chicago, Illinois.

/s/ Justin R. Gaudio

Justin R. Gaudio

Counsel for Plaintiff Oakley, Inc.